



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217-524-1655

217-557-1165 FAX

EPA Region 5 Records Ctr.



365661

February 22, 2008

CERTIFIED MAIL;
RETURN RECEIPT REQUESTED
PROMPT REPLY NECESSARY

7002 2030 0001 1873 9436

All Florida Scrap Metals, Inc.
Attn: Mark Karm; President/ Secretary
2710 NW 32 Ave.
Miami, FL 33142

Re: Request for Information Pursuant to Section 4(e) of the Illinois Environmental Protection Act, (Act, 415 Illinois Compiled Statutes (ILCS) 5/4(e)) and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, (CERCLA or Superfund, 42 United States Code (U.S.C.) § 9601, et seq.).

Site: 1198010003 - Madison County
Chemetco Site
ILD 048 843 809
Hartford/Madison County
Superfund/Technical Reports

RELEASE

FEB 25 2008

REVIEWER MD

This letter seeks your cooperation in providing information and documents relating to the contamination present at the Chemetco Site owned and formerly operated by Chemetco, Inc. in Hartford, Illinois (Site or Chemetco Site). This site is contaminated with high levels of hazardous substances which may present a threat to human health or the environment.

We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request and attached questions (Attachment B) within 30 days of your receipt of this letter.

The Illinois Environmental Protection Agency (Illinois EPA) is investigating the release or threat of release of hazardous substances, pollutants, or contaminants at the Site. Illinois EPA is seeking to obtain information concerning the generation, storage, treatment, transportation, and methods used to dispose of such substances that have been, or threaten to be, released from the Site. Illinois EPA will study the effects of these substances on the environment and public health. In addition, Illinois EPA will identify activities, materials, and parties that contributed to

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 967-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3731 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINGSVILLE - 2009 Mall Street, Collingsville, IL 62234 - (618) 346-3120
MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

1198010003 - Madison County
Chemetco Site CERCLA 104(c) Information Request
ILD 048843809
Page 2 of 4

contamination at the Site. Illinois EPA believes you might have information that may assist in this investigation of the Site.

Illinois EPA has determined that the decades-long practice at the Chemetco Site of receiving smelting and processing scrap metals and other materials impacted the surrounding soils, groundwater, and surface water and created a hazard for area residents and the environment. The Chemetco facility was built in 1969 and began operations in 1970. The site ceased operations on October 31, 2001 and filed for Chapter 7 bankruptcy on November 13, 2001.

During an investigation by Illinois EPA, it was revealed that the sediment samples collected from the tributary of Long Lake and in Long Lake exceed both ecotoxicological benchmarks and meet observed release criteria according to the Hazard Ranking System for cadmium, copper, lead and nickel. These are all metals which are present at significantly elevated levels in the zinc oxide slurry which Chemetco discharged into Long Lake. In December of 2001, Illinois EPA sampled seven areas around the site where stormwater collects. All seven samples exceeded the effluent standards for lead and several of the samples also exceeded the effluent standards for cadmium, copper, zinc and oil. There exists the potential for wind dispersion of hazardous material from the uncontained slag and zinc oxide piles. In 1998, the United States Environmental Protection Agency (USEPA) sampled the fields adjacent to the slag pile and found high levels of lead and cadmium compared to background levels.

In 1988 and 2000, Illinois EPA found levels of dioxins in the east/west cooling water canal above background. In 1981 the Perched Shallow Aquifer beneath Chemetco contained elevated metals concentration and lowered pH levels. Illinois EPA collected groundwater samples in April, 1998, March, 2001 and May, 2002. During all three of these rounds of sampling, contaminant levels exceeded the 35 Illinois Administrative Code 620 Class I Groundwater Quality Standards. The May 2002 data for the Perched Shallow Aquifer exceeded standards for arsenic, boron, cadmium, copper, iron, manganese, nickel, selenium, and zinc. There were also detections of the organic compounds; cis-1,2-dichloroethylene, methyltertiarybutylether, 1,1,2-trichloroethylene, xylene, phenol, 2-chlorophenol, 2-methylphenol, 4-methylphenol, and 2,4,6-trichlorophenol. In the March, 2001 data the groundwater was found to have exceedences of boron, cadmium, copper, iron, lead, manganese, mercury, nickel, selenium, sulfate and zinc.

Description of Legal Authority

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601, *et seq.*, commonly referred to as "CERCLA" and "Superfund" and Section 22.2(f) of the Illinois Environmental Protection Act, 415 ILCS 5/22(f) gives the Illinois EPA the authority to, among other things: (1) assess contaminated sites, (2) determine the threats to human health and the environment posed by each site, and (3) clean up those sites in the order of the relative threats posed by each.

**1198010003 – Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 3 of 4**

Information Request

Pursuant to Section 4(e) of the Illinois Environmental Protection Act, 415 ILCS 5/4(e) and Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), Illinois EPA has broad information gathering authority which allows Illinois EPA to require persons to furnish information and documents relating to:

- (A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.
- (B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.
- (C) Information relating to the ability of a person to pay for or to perform a cleanup.

Although the Illinois EPA seeks your cooperation in this investigation, compliance with the Information Request is required by law. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under state and federal law.

Some of the information the Illinois EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish Illinois EPA to treat the information confidentially, you must advise the Illinois EPA of that fact by following the procedures outlined in Attachment A, including the requirement for supporting your claim for confidentiality.

If you have information about other parties who may have information which may assist the Illinois EPA in its investigation of Chemetco and the Chemetco Site or may be responsible for the contamination at the Site, that information should be submitted within the time frame noted above.

Instructions on how to respond to the questions in Attachment B to this document are described in Attachment A. If you have specific questions regarding the history of the Chemetco Site or the nature of the actions contemplated by the Illinois EPA, please contact Erin J. Rednour, Remedial Project Manager at 217-785-8725. For questions relating to this information request, please contact Michael S. Roubitchev, Assistant Counsel at 217-782-8858. Your response to this

1198010003 -- Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 4 of 4


Information Request should be mailed within 30 days of receipt to each of the following addresses:

Erin J. Rednour, Remedial Project Manager
Illinois Environmental Protection Agency
Bureau of Land
Division of Remediation Management
Mailcode 24
Post Office Box 19276
Springfield, Illinois 62794-9276

Techlaw
Attn: Ann Anderson
205 West Wacker Drive
Suite 1622
Chicago, Illinois 60606

We appreciate and look forward to your prompt response to this Information Request.

Respectfully,


Clarence L. Smith, Manager
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land

Enclosures

cc:

115-010003 - Madison County
Chemetro Site CERCLA 104(e) Information Request
ILD 048843809
Page 4 of 4


Information Request should be mailed within 30 days of receipt to each of the following addresses:

Erin J. Rednour, Remedial Project Manager
Illinois Environmental Protection Agency
Bureau of Land
Division of Remediation Management
Mailcode 24
Post Office Box 19276
Springfield, Illinois 62794-9276

Techlaw
Attn: Ann Anderson
205 West Wacker Drive
Suite 1622
Chicago, Illinois 60606

We appreciate and look forward to your prompt response to this Information Request.

Respectfully,


Clarence L. Smith, Manager
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land

Enclosures

cc:

**The appearance of some of the images
following this page is due to**

Poor Quality Original Documents

and not the scanning or filming processes.

**Com Microfilm Company
(217) 525-5860**

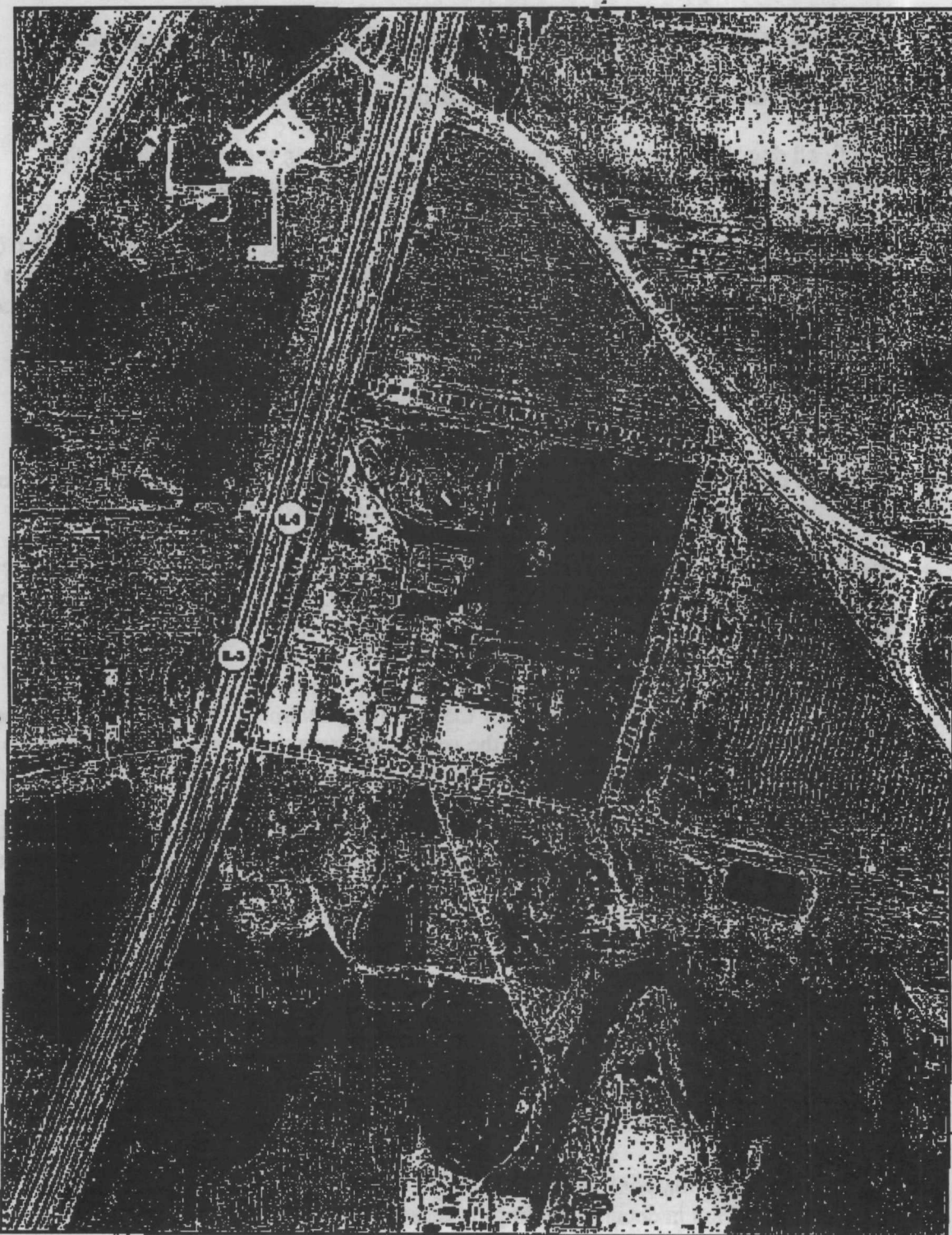
1198010003 - Madison County

Chemtco Site

ILD 048 843 809

Hartford/Madison County

Superfund/Technical Reports



0 50 100 200 300 400 Meters



Attachment B
Questions

1. Identify the person(s) answering this Information Request on behalf of the Respondent.
2. Identify all person(s) consulted in the preparation of the answers to these questions.
3. Identify the parent corporation and all subsidiaries of the Respondent.
4. Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions, and provide copies of all such documents.
5. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons. Provide the current or most recent known address and telephone number of each individual identified.
6. Describe your company's business activities which resulted in sending material to the Chemetco Site.
7. Identify all persons having knowledge or information about the generation, transportation to, treatment, disposal, or other handling of hazardous substances (including materials containing lead, cadmium, boron, copper, iron, manganese, mercury, nickel, selenium, sulfate, zinc or other heavy metals), by you, your contractors, subcontractors or by prior owners and/operators which relates or may relate to the Chemetco Site, including but not limited to persons who arranged for disposal of or transported hazardous substances to the Chemetco Site.
8. Describe your policies and procedures for the handling, treatment, storage and/or disposal of hazardous substances encountered in the course of your activities at the Site. Provide copies of records relating to this policy as well as to its implementation.
9. Identify all individuals who currently have, or who previously had, responsibility for your company's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of your company's wastes, scrap materials and/or recyclable materials). For each, indicate the dates of the individual's employment and the nature of the individual's duties and responsibilities, and a description of the type of environmental information that the individual would possess.
10. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials, particularly Section 127 of CERCLA, 42 U.S.C. 9627, sent to the Chemetco Site.
11. Was any shipment of material sent to the Chemetco Site ever refused and/or returned? If so, describe this event in detail, including its cause and outcome.

Attachment B

1198010003 - Madison County

Chemtco Site CERCLA 104(e) Information Request

ILD 048843809

Page 2 of 10

12. Was any material shipment sent to the Chemtco Site ever subject of a change in payment terms because of increase of handling costs or any problem with the material sent to the Site? If so, describe this event in detail, including its cause and outcome.
13. Provide copies of the Material Data Safety Sheets for any materials disposed of or shipped to or stored at the Chemtco Site.
14. Have you ever received a formal Information Request [similar to this one] from local, state or federal government concerning the recycling of materials at other scrap yards? Provide a copy of the Request and your response.
15. Specify whether your company was ever the subject of legal action by any party, including the government, by virtue of your transportation of hazardous substances or other waste materials to the Site. If so, describe in detail and provide any records associated with such legal action.
16. Identify all liability insurance policies held by Respondent from the period you transported materials or other waste materials to the Site. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration date for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. Provide complete copies of all relevant insurance policies.
17. List all USEPA, RCRA and State of Illinois Identification Number(s) of your company.
18. Identify all transactions or agreements for disposal in which your company disposed of, arranged for the disposal or treatment of, transported, or arranged for the transportation of any material or item, scrap materials, waste materials to the Site (including but not limited to drosses, slags, sludges, powders, or combustible materials). In addition:
 - (a) Identify whether the materials were sent pursuant to a contractual arrangement and, if so, describe the terms of that arrangement.
 - (b) Identify whether the materials were delivered directly to the Chemtco site or were trans-shipped there from another intermediate delivery point. If applicable, describe each such delivery point.
 - (c) Identify the persons involved in sending such material to the Site.

Attachment B
1198010003 - Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 3 of 10

- (d) State the dates on which each such persons may have transported or delivered for transport such material.
 - (e) Describe the source of or the process that produced the materials.
 - (f) Describe the materials or items, including type of material, chemical content, physical state, quantity by volume and weight, and other characteristics.
 - (g) Describe the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement.
 - (h) State whether any of the material was ever tested by your company and if so, whether the hazardous substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. 261, Subpart C.
 - (i) Describe what was done to materials once they were brought to the Chemetco Site, including any further processing of the materials.
 - (j) Describe as precisely as possible any and all of the locations at which each hazardous material involved in such transactions actually was disposed or treated.
 - (k) Describe any measures taken by the Respondent prior to or during each arrangement to determine the compliance history of the Site where the treatment of disposal would actually take place.
19. Describe in general detail the types of material that your company arranged for the transportation of or transported for recycling at Chemetco. In your response, please provide answers to the following questions:
- (a) Give the generic name of each type of materials shipped to Chemetco (e.g., scrap metal, batteries, scrap paper, scrap plastic, scrap textile (scrap material), scrap electronic equipment, etc.).
 - (b) Specify the quantity (volume and weight) of materials your company sent to Chemetco for recycling on a year by year basis.
20. Provide any additional information and all documents that you believe relate to the type, nature and characteristics of the materials your company sent to the Chemetco Site.

Attachment B
1198010003 - Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 4 of 10

Questions and Requests for Documents Related to Scrap Metal

21. For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
- (a) List the years in which your company sent scrap metal to Chemetco and/or broker for recycling. In this list state the type and approximate quantity, volume and weight of scrap metal sent for each year.
 - (b) Did a market exist for the scrap metal listed in your response to 21 (a) above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
 - (c) What commercial specification grade did the scrap metal listed in your response to question 21(a) meet? Identify/list the commercial specification grades that each scrap metal identified in 21(a) met.
 - (d) At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question 21(a)? Did this include burning as fuel, or for energy recovery, or incineration?
 - (e) After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to question 21(a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.
 - (f) Could the scrap metal listed in your response to question 21(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
 - (g) Could any products made from the scrap metal listed in your response to question 21(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
 - (h) Did your company melt the scrap metal listed in your response to question 21(a) before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal. In addition, explain whether Chemetco ever received for processing "dross" or "skimmings" or "sludges" at the Site.

Attachment B
1198010003 - Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 5 of 10

- (i) Was the transaction between your company and Chemetco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date?
 - (j) Describe the source of or the process that produced the materials.
22. Did any of the scrap material sent to Chemetco contain other material(s) incident to or adhering to the scrap? If so, describe in detail.
23. Did any of the material sent to Chemetco contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at Chemetco, after being received at the Site, or was the wire not stripped?
24. Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.
25. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question 21(a).
26. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or local environmental regulations or standards, and any amendments, with respect to scrap metal?
27. Describe the efforts your company undertook with respect to the management and handling of the scrap metal listed in your response to question 21(a), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.
28. Provide all information in your possession that shows that your company was in compliance with applicable Federal, State, and local environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap metal listed in your response to question 21(a).

Attachment B
1198010003 - Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 6 of 10

Questions and Request for Documents Related to Batteries

29. For the following questions which relate to transactions involving batteries (lead-acid batteries, nickel-cadmium batteries, reject batteries, lithium, and other spent batteries), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
- (a) Provide an estimate of all shipments of whole batteries sent to the Site on an annual basis. In this list, provide an approximation of number of batteries, type of battery (e.g., lead-acid, nickel-cadmium, lithium, reject, or other) and quantity sent.
 - (b) What commercial specification grade did the batteries listed in your response to question 29(a) meet? Identify/list the commercial specification grades that each type of battery identified in question 29(a) met.
 - (c) Did a market exist for the batteries listed in your response to question 29(a)? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
 - (d) At the time of the transaction, what was the intended disposition of the batteries listed in your response to question 29(a)?
 - (e) What portion of the batteries listed in your response to question 29(a) were to be made available for use as a feedstock for manufacturing new saleable products? Explain how the portion identified in this answer was derived or calculated.
 - (f) Could the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
 - (g) Could any products to be made from the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
 - (h) Was the transaction between your company and Chemetco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date.

Attachment B
1198010003 – Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 7 of 10

- (i) What, if any, components of the whole batteries listed in your response to question 29(a) were removed before transport to the Site? Describe what was removed, and where such removal occurred. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components.
 - (j) Were the components of the whole batteries removed once delivered to the Chemetco Site? Describe the method used to recover the components. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components.
 - (k) Describe the source of or the process that produced the materials.
30. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the batteries identified in your response to question 29(a).
31. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to batteries?
32. Describe the efforts your company undertook with respect to the management and handling of the batteries listed in your response to question 29(a), including the extent to which you complied with customary industry practices current at the time of the transaction, designed to minimize contamination of the Site and/or releases of hazardous substances at the Chemetco Site.
33. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of batteries listed in your response to question 29(a).
34. For the following questions which relate to transactions involving scrap paper, plastic, glass, textiles or rubber (scrap material), provide requested information, and also provide copies of any documents that contain any information that is related to the response:
- (a) Provide an estimate of all shipments of scrap paper, plastic, glass, textile or rubber your company sent to Chemetco on an annual basis. In this list, include the type and an estimate of the quantity, volume and weight of scrap material sent to the Site each year.

Attachment B
1198010003 - Madison County
Chemtco Site CERCLA 104(e) Information Request
ILD 048843809
Page 8 of 10

- (b) What commercial specification grade did the scrap material listed in your response to question 36(a) meet? List/identify the commercial specification grades that each scrap material identified in 36(a) met.
 - (c) Did a market exist for the scrap materials listed in your response to question 34(a) above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
 - (d) At the time of the transaction(s), what was the intended disposition of the scrap material listed in your response to question 34(a)? Did the intended disposition include burning as a fuel, or for energy recovery or incineration?
 - (e) After sale, transfer, delivery, or disposal, what portion of the scrap material listed in your response to question 36(a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.
 - (f) Could the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
 - (g) Could any products to be made from the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
 - (h) Describe the source of or the process that produced the materials.
35. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap material identified in your response to question 34(a).
36. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemtco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to scrap material?
37. Describe the efforts of your company undertook with respect to the management and handling of the scrap material listed in your response to question 34(a), including the extent to which you complied with customary industry practices current at the time of the

Attachment B
1198010003 - Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 9 of 10

transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.

38. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap material listed in your response to question 34(a).

Questions and Request for Documents Related to Electrical and Electronic Equipment

39. For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers or other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
- (a) List an estimated number of shipments of electrical and electronic equipment your company sent to Chemetco on an annual basis. In this list, include the following:
 - i the type and quantity, volume and weight of electrical and electronic equipment sent;
 - ii. the amount paid or collected in connection with the transaction for each category of electrical and electronic equipment and the method of payment.
 - (b) At the time of the transaction(s), what was the intended disposition of the electrical and electronic equipment listed in your response to question 39(a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?
 - (c) Describe the source of or the process that produced the materials.
40. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the electrical and electronic equipment identified in your response to question 39(a).
41. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to electrical and electronic equipment?

Attachment B

1198010003 – Madison County

Chemtco Site CERCLA 104(e) Information Request

ILD 048843809

Page 10 of 10

42. Describe the efforts your company undertook with respect to the management and handling of the electrical and electronic equipment listed in your response to question 39(a), including the extent to which your company complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.
43. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of the electrical and electronic equipment listed in your response to question 39(a).

Attachment B
1198010003 - Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 2 of 10

12. Was any material shipment sent to the Chemetco Site ever subject of a change in payment terms because of increase of handling costs or any problem with the material sent to the Site? If so, describe this event in detail, including its cause and outcome.
13. Provide copies of the Material Data Safety Sheets for any materials disposed of or shipped to or stored at the Chemetco Site.
14. Have you ever received a formal Information Request [similar to this one] from local, state or federal government concerning the recycling of materials at other scrap yards? Provide a copy of the Request and your response.
15. Specify whether your company was ever the subject of legal action by any party, including the government, by virtue of your transportation of hazardous substances or other waste materials to the Site. If so, describe in detail and provide any records associated with such legal action.
16. Identify all liability insurance policies held by Respondent from the period you transported materials or other waste materials to the Site. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration date for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. Provide complete copies of all relevant insurance policies.
17. List all USEPA, RCRA and State of Illinois Identification Number(s) of your company.
18. Identify all transactions or agreements for disposal in which your company disposed of, arranged for the disposal or treatment of, transported, or arranged for the transportation of any material or item, scrap materials, waste materials to the Site (including but not limited to drosses, slags, sludges, powders, or combustible materials). In addition:
 - (a) Identify whether the materials were sent pursuant to a contractual arrangement and, if so, describe the terms of that arrangement.
 - (b) Identify whether the materials were delivered directly to the Chemetco site or were trans-shipped there from another intermediate delivery point. If applicable, describe each such delivery point.
 - (c) Identify the persons involved in sending such material to the Site.

Attachment B

1198010003 – Madison County

Chemetco Site CERCLA 104(c) Information Request

ILD 048843809

Page 3 of 10

- (d) State the dates on which each such persons may have transported or delivered for transport such material.
 - (e) Describe the source of or the process that produced the materials.
 - (f) Describe the materials or items, including type of material, chemical content, physical state, quantity by volume and weight, and other characteristics.
 - (g) Describe the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement.
 - (h) State whether any of the material was ever tested by your company and if so, whether the hazardous substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. 261, Subpart C.
 - (i) Describe what was done to materials once they were brought to the Chemetco Site, including any further processing of the materials.
 - (j) Describe as precisely as possible any and all of the locations at which each hazardous material involved in such transactions actually was disposed or treated.
 - (k) Describe any measures taken by the Respondent prior to or during each arrangement to determine the compliance history of the Site where the treatment of disposal would actually take place.
19. Describe in general detail the types of material that your company arranged for the transportation of or transported for recycling at Chemetco. In your response, please provide answers to the following questions:
- (a) Give the generic name of each type of materials shipped to Chemetco (e.g., scrap metal, batteries, scrap paper, scrap plastic, scrap textile (scrap material), scrap electronic equipment, etc.).
 - (b) Specify the quantity (volume and weight) of materials your company sent to Chemetco for recycling on a year by year basis.
20. Provide any additional information and all documents that you believe relate to the type, nature and characteristics of the materials your company sent to the Chemetco Site.

Attachment B
1198010003 - Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 4 of 10

Questions and Requests for Documents Related to Scrap Metal

21. For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
- (a) List the years in which your company sent scrap metal to Chemetco and/or broker for recycling. In this list state the type and approximate quantity, volume and weight of scrap metal sent for each year.
 - (b) Did a market exist for the scrap metal listed in your response to 21 (a) above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
 - (c) What commercial specification grade did the scrap metal listed in your response to question 21(a) meet? Identify/list the commercial specification grades that each scrap metal identified in 21(a) met.
 - (d) At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question 21(a)? Did this include burning as fuel, or for energy recovery, or incineration?
 - (e) After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to question 21(a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.
 - (f) Could the scrap metal listed in your response to question 21(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
 - (g) Could any products made from the scrap metal listed in your response to question 21(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
 - (h) Did your company melt the scrap metal listed in your response to question 21(a) before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal. In addition, explain whether Chemetco ever received for processing "dross" or "skimmings" or "sludges" at the Site.

Attachment B

1198010003 – Madison County

Chemetco Site CERCLA 104(e) Information Request

ILD 048B43809

Page 5 of 10

- (i) Was the transaction between your company and Chemetco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date?
 - (j) Describe the source of or the process that produced the materials.
- 22. Did any of the scrap material sent to Chemetco contain other material(s) incident to or adhering to the scrap? If so, describe in detail.
- 23. Did any of the material sent to Chemetco contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at Chemetco, after being received at the Site, or was the wire not stripped?
- 24. Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.
- 25. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question 21(a).
- 26. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or local environmental regulations or standards, and any amendments, with respect to scrap metal?
- 27. Describe the efforts your company undertook with respect to the management and handling of the scrap metal listed in your response to question 21(a), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.
- 28. Provide all information in your possession that shows that your company was in compliance with applicable Federal, State, and local environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap metal listed in your response to question 21(a).

Attachment B
1198010003 – Madison County
Chemtco Site CERCLA 104(e) Information Request
ILD 048843809
Page 6 of 10

Questions and Request for Documents Related to Batteries

29. For the following questions which relate to transactions involving batteries (lead-acid batteries, nickel-cadmium batteries, reject batteries, lithium, and other spent batteries), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
- (a) Provide an estimate of all shipments of whole batteries sent to the Site on an annual basis. In this list, provide an approximation of number of batteries, type of battery (e.g., lead-acid, nickel-cadmium, lithium, reject, or other) and quantity sent.
 - (b) What commercial specification grade did the batteries listed in your response to question 29(a) meet? Identify/list the commercial specification grades that each type of battery identified in question 29(a) met.
 - (c) Did a market exist for the batteries listed in your response to question 29(a)? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
 - (d) At the time of the transaction, what was the intended disposition of the batteries listed in your response to question 29(a)?
 - (e) What portion of the batteries listed in your response to question 29(a) were to be made available for use as a feedstock for manufacturing new saleable products? Explain how the portion identified in this answer was derived or calculated.
 - (f) Could the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
 - (g) Could any products to be made from the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
 - (h) Was the transaction between your company and Chemtco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date.

Attachment B
1198010003 – Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 7 of 10

- (i) What, if any, components of the whole batteries listed in your response to question 29(a) were removed before transport to the Site? Describe what was removed, and where such removal occurred. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components.
 - (j) Were the components of the whole batteries removed once delivered to the Chemetco Site? Describe the method used to recover the components. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components.
 - (k) Describe the source of or the process that produced the materials.
- 30. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the batteries identified in your response to question 29(a).
- 31. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to batteries?
- 32. Describe the efforts your company undertook with respect to the management and handling of the batteries listed in your response to question 29(a), including the extent to which you complied with customary industry practices current at the time of the transaction, designed to minimize contamination of the Site and/or releases of hazardous substances at the Chemetco Site.
- 33. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of batteries listed in your response to question 29(a).
- 34. For the following questions which relate to transactions involving scrap paper, plastic, glass, textiles or rubber (scrap material), provide requested information, and also provide copies of any documents that contain any information that is related to the response:
 - (a) Provide an estimate of all shipments of scrap paper, plastic, glass, textile or rubber your company sent to Chemetco on an annual basis. In this list, include the type and an estimate of the quantity, volume and weight of scrap material sent to the Site each year.

Attachment B
1198010003 – Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 8 of 10

- (b) What commercial specification grade did the scrap material listed in your response to question 36(a) meet? List/identify the commercial specification grades that each scrap material identified in 36(a) met.
 - (c) Did a market exist for the scrap materials listed in your response to question 34(a) above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
 - (d) At the time of the transaction(s), what was the intended disposition of the scrap material listed in your response to question 34(a)? Did the intended disposition include burning as a fuel, or for energy recovery or incineration?
 - (e) After sale, transfer, delivery, or disposal, what portion of the scrap material listed in your response to question 36(a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.
 - (f) Could the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
 - (g) Could any products to be made from the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
 - (h) Describe the source of or the process that produced the materials.
35. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap material identified in your response to question 34(a).
36. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to scrap material?
37. Describe the efforts of your company undertook with respect to the management and handling of the scrap material listed in your response to question 34(a), including the extent to which you complied with customary industry practices current at the time of the

Attachment B
1198010003 - Madison County
Chemetco Site CERCLA 104(e) Information Request
ILD 048843809
Page 9 of 10

transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.

38. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap material listed in your response to question 34(a).

Questions and Request for Documents Related to Electrical and Electronic Equipment

39. For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers or other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
- (a) List an estimated number of shipments of electrical and electronic equipment your company sent to Chemetco on an annual basis. In this list, include the following:
 - i the type and quantity, volume and weight of electrical and electronic equipment sent;
 - ii. the amount paid or collected in connection with the transaction for each category of electrical and electronic equipment and the method of payment.
 - (b) At the time of the transaction(s), what was the intended disposition of the electrical and electronic equipment listed in your response to question 39(a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?
 - (c) Describe the source of or the process that produced the materials.
40. Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the electrical and electronic equipment identified in your response to question 39(a).
41. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to electrical and electronic equipment?

Attachment B

1198010003 – Madison County

Chemtco Site CERCLA 104(e) Information Request

ILD 048843809

Page 10 of 10

42. Describe the efforts your company undertook with respect to the management and handling of the electrical and electronic equipment listed in your response to question 39(a), including the extent to which your company complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.
43. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of the electrical and electronic equipment listed in your response to question 39(a).